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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

In re:) Case No. 23-10566-KHK
)
EAGLE PROPERTIES AND INVESTMENTS,) Chapter 7
LLC,)
)
Debtor.)
)

**RESPONSE OF FULTON BANK, N.A. TO MOTION TO APPROVE
SALE OF 7616 GROVE AVENUE, HARRISBURG, PENNSYLVANIA
FREE AND CLEAR OF LIS PENDENS**

Fulton Bank, N.A. responds to the Chapter 7 Trustee's Motion to Approve Sale of 7616 Grove Avenue, Harrisburg, Pennsylvania (the "Real Property") Free and Clear of Lis Pendens pursuant to 11 U.S.C. Section 363(f) (Doc 542) as follows:

1. Fulton Bank, N.A. has a first priority deed of trust against the Real Property.
2. The proposed sale price of \$267,500.00 is acceptable to Fulton Bank, N.A.
3. Fulton Bank, N.A. consents to the sale proposed by the trustee as long as Fulton Bank, N.A. receives at closing, which must occur within twenty days after court approval, all net sale proceeds subject to the Carve-Out Order.
4. The sale should be free and clear of the lis pendens claimed by Bala Jain, LLC because the lis pendens is in bona fide dispute.

Dated: August 5, 2024

/s/ David S. Musgrave

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CERTIFICATE OF SERVICE

I certify that on August 5, 2024, copies of the foregoing were served via CM/ECF to all parties receiving notice thereby.

/s/ David S. Musgrave

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